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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

19 LA ALLIANCE FOR HUMAN RIGHTS, et
20 al..

No. 2:20-cv-02291-DOC-KES

Hon. David O. Carter

**DEFENDANT COUNTY OF LOS
ANGELES APRIL 13, 2020 STATUS
REPORT**

21 Plaintiffs.

22 v.

22 CITY OF LOS ANGELES, et al.

24 | Defendants

26 On April 10, 2020, the Court requested that Defendant County of Los Angeles (“County”)
27 provide a status report “with a special emphasis on Skid Row and the surrounding area [addressing]
28 (1) the availability of coronavirus testing; (2) ongoing efforts to install, maintain, and service

1 sanitation facilities; and (3) the availability of housing accommodations, including acquired
 2 properties, rental properties, and government facilities that can be readily converted.” As discussed
 3 below, while the City of Los Angeles (“City”) is the jurisdictional lead for testing, hygiene, and
 4 land use within Skid Row, the County is actively working to supplement City efforts, especially
 5 where the County can leverage or reallocate its resources to protect and support persons
 6 experiencing homelessness in Skid Row.¹

7 **I. TESTING IN SKID ROW**

8 County efforts to support COVID-19 testing revolve around three main considerations. First,
 9 the County is working to ensure that tests are available—and accessible—to persons experiencing
 10 homelessness in conformity with the standards recommended for the population as a whole. Second,
 11 the County is working with its Department of Health Services (“DHS”)-controlled health programs
 12 and clinics as well as coordinating with Federally Qualified Health Clinics (“FQHCs”) in Skid Row
 13 so persons experiencing homelessness are tested, and if needed, are connected with the appropriate
 14 level of care. Third, the County is coordinating with the City and other partners to administer
 15 COVID-19 testing to persons experiencing homelessness who are on the street but are not necessarily
 16 visiting clinics for testing.

17 As of the date of this filing, the County is actively working with five labs in Southern
 18 California to manufacture and deliver COVID-19 tests. Regionally, approximately 6,000 persons are
 19 tested per day, with the goal of nearly doubling that capacity within the next week.² With respect to
 20 the Skid Row population, the County has provided test kits to its Housing for Health program as well
 21 as two County-controlled clinics in Skid Row, i.e., the Star Clinic and the Union Rescue Mission
 22 (“URM”) since the start of the COVID-19 crisis on an as needed basis. Currently, Housing for Health,
 23 the Star Clinic, and the URM Clinic do not have a shortage of tests.

24 _____
 25 ¹ This Status Report is focused on Skid Row as requested by the Court. However, the County has
 26 also dedicated significant testing, hygiene, and housing resources outside of Skid Row, particularly
 27 in smaller cities and unincorporated areas of the County.

28 ² The County helped established a network of 22 testing centers in the County (16 are controlled
 29 by the County and 6 are controlled by the City). Testing is provided free of charge. Persons are
 30 screened online and given an appointment for testing, if symptomatic. Assuming a person has an
 31 appointment for testing, the existing network permits drive-thru or walk-up testing.

1 Within the last few days, approximately 200 tests also were made available to the City for
 2 persons experiencing homelessness, supplementing the City's existing test supply. DHS also is
 3 coordinating with two FQHCs in Skid Row—the JWCH Center for Community Health and Los
 4 Angeles Christian Health Center—to ensure that a sufficient number of tests are available to
 5 persons experiencing homelessness who need testing. Testing is focused on individuals exhibiting
 6 symptoms of COVID-19.

7 Overall, the County does not currently envision testing shortages for the populations served
 8 by the County in Skid Row, although this could change. As a result, the availability of tests is
 9 closely monitored. The challenge for the County is ensuring that persons experiencing
 10 homelessness are aware of their test results and treated, as appropriate. County tests rely on nasal
 11 or oral swabs. Results arrive 24 to 72 hours after testing occurs, which may be problematic for
 12 certain persons experiencing homelessness who could be difficult to locate.

13 Starting on April 13, 2020, DHS will be pairing four existing multi-disciplinary outreach
 14 teams (already deployed in Skid Row³) with street-based nursing staff to increase clinical capacity
 15 in Skid Row. These registered nurses will conduct wellness checks and administer tests for persons
 16 exhibiting COVID-19 symptoms. The outreach teams will be deployed Monday through Friday
 17 from approximately 8:30 a.m. to 4:00 p.m. The L.A. Christian Health Center, one of the FQHCs
 18 working in coordination with the County, also has a street outreach team.

19 DHS-controlled street teams are divided across four quadrants in Skid Row. Team members
 20 already have relationships with Skid Row residents. The County wants to use teams that know a
 21 given population in Skid Row so when results arrive, persons who are tested can be located and
 22 treated. The County continues to evaluate whether the number of teams deployed in Skid Row is
 23 adequate. However, given the lag in time between testing and the receipt of test results, the County
 24 believes knowing a given individual is nearly as important as the number of teams deployed.

25
 26 ³ These teams include health providers, mental health professionals, substance abuse professionals,
 27 case managers, and persons with “lived homeless experience.” There are approximately 60 such
 28 teams Countywide. Given the County’s charge to support persons experiencing homelessness
 outside of Los Angeles, the County has resource limitations. Nevertheless, the County is constantly
 identifying, reviewing, and monitoring priority areas in order to redeploy services where the
 greatest needs exist.

1 The County is also in the process of supplementing outreach to persons experiencing
2 homelessness by embedding staff from the Los Angeles County Fire Department (“LACFD”) with
3 current mobile health care outreach teams at prioritized locations, including Skid Row. As
4 currently planned, LACFD would provide a paramedic, an Emergency Medical Services worker,
5 and ambulance enabling transportation for individuals with emergent medical needs. These teams
6 would provide triage and screening of COVID-19 symptoms as well as field-based testing, wellness
7 checks and basic first aid. These enhanced teams would also support outreach communication with
8 the Department of Public Health (“DPH”) regarding individuals with COVID-19 symptoms. The
9 County is in the process of shifting 8 paramedics and 8 EMS (one per Service Planning Area
10 (“SPA”)) to effectuate this plan Countywide. The enhanced teams would initially be available from
11 Monday to Friday, 8:30 a.m. to 12:30 pm, with the ability to expand to full 8-hour shifts if needed.

12 Finally, DMH is in the process of deploying eighteen (18) additional outreach workers to
13 Skid Row. The specific timing and scope of the DMH deployment remains in development, but
14 the intent is to have these outreach workers supplement the existing DMH presence in Skid Row
15 as soon as possible (DMH already has several Homeless Outreach and Engagement “HOME” teams
16 in Skid Row). The County is working to specifically determine how additional outreach can assist
17 in identifying, testing, and treating persons with or exhibiting symptoms of COVID-19.

18 **II. HYGIENE IN SKID ROW**

19 In the County’s April 10, 2020 Status Report, the County reported that it identified two
20 facilities with available restrooms—one located at 224 East 6th Street and the other at 512 South San
21 Pedro St.—along with plans to open a third at 813 East 4th Place. *See* Dkt. 60. As of this filing, the
22 County has additional information concerning the third facility identified by the County, which will
23 be opening as soon as possible this week. The facility will be located at 813 East 4th Street in a
24 building controlled by the Department of Public Social Services (“DPSS”). Six toilets, four urinals,
25 and four sinks will be made available to males, and four toilets and four sinks will be made available
26 to females. The facility will be open 7 days per week from 5:30 a.m. to 10:00 p.m. On-site security
27 and janitorial staff will be provided.

28

1 In addition, the County moved forward with opening restroom facilities at two locations at
2 the Music Center, with one located at 200 N. Grand Ave and another at 201 N. Spring Street. At
3 each facility, two toilets, two urinals, and two sinks will be made available to males, and four toilets
4 and two sinks will be made available to females. Like the DPSS facility, these restrooms will be
5 open 7 days per week from 5:30 a.m. to 10:00 p.m. On-site security and janitorial staff will be
6 provided. While the Music Center is approximately two miles from Skid Row, the opening of these
7 facilities may help alleviate pressure on facilities in Skid Row.

8 The County is also actively working to advertise the availability of new hygiene facilities.
9 To assist in these efforts, after the County filed its April 10, 2020 Status Report, the County asked
10 outreach leadership at the Los Angeles Homeless Services Authority (“LAHSA”), DMH, and DHS
11 to update existing maps of hygiene facilities so outreach workers can notify persons in Skid Row
12 that new washrooms are available. The County also continues to improve signage at the facilities
13 concerning the availability of the restrooms.

14 The County remains engaged with efforts to expand the number of washrooms used for
15 residents in Skid Row. For instance, the County is evaluating whether certain DMH facilities can
16 be opened for use by the general public in Skid Row. The County expects DMH facilities to open
17 shortly, assuming they are viable candidates for use. In addition, with the COVID-19 “Safer at
18 Home” orders in place, certain County parking facilities in Skid Row are currently underutilized
19 and potentially available for temporary repurposing. Accordingly, on April 13, 2020, the County
20 offered the City a parking lot property at the Skid Row Sobering Center located at 646 South Maple
21 Avenue. The parking lot can handle approximately 2-3 portable toilets and 1 hand washing station.
22 The County will also permit the City to utilize existing on-site security personnel, although
23 additional City security may be needed. Finally, the County is still attempting to work with private
24 partners such as the Skid Row Housing Trust to open restrooms.

25 **III. HOUSING ACCOMMODATIONS**

26 As noted above, the Court asked for a Status Report on “the availability of housing
27 accommodations, including acquired properties, rental properties, and government facilities that can
28 be readily converted” with emphasis on Skid Row. Recently, the County has focused on temporary

1 housing for persons with or at risk of contracting COVID-19. However, the County is also working
 2 to address homelessness more broadly in Skid Row and regionwide. Below, the County provides an
 3 update on COVID-19 related housing efforts impacting Skid Row, followed by a summary of recent
 4 efforts to increase the availability of housing accommodations near Skid Row.

5 **1. COVID-19 Housing for Skid Row**

6 The County has two types of temporary housing available: (i) beds for isolation and
 7 quarantine, made available to persons who either have or are exhibiting symptoms of COVID-19;
 8 and (ii) beds for “high risk” persons, defined by FEMA as those experiencing homelessness who
 9 are asymptomatic for COVID-19 but over 65 or with underlying health conditions (respiratory,
 10 compromised immunities, chronic disease), and requiring emergency non-congregate shelter as a
 11 social distancing measure. Both housing types are available to persons experiencing homelessness
 12 regardless of geography, with free transportation available for persons who qualify for beds.

13 The County has made strides securing contracts and “standing up” hotels or motels for
 14 quarantine/isolation and high-risk individuals Countywide.⁴ The County will provide transportation
 15 to persons experiencing homelessness to any given hotel/motel site, if the sites are at capacity in the
 16 individual’s immediate area. However, securing beds in or around Skid Row has been difficult
 17 despite hiring more than a dozen leasing agents, and having reached out to numerous hotel/motel
 18 owners, covering thousands of individual units in or around Skid Row.

19 In terms of quarantine/isolation, the County secured 294 beds at a hotel located 2 miles from
 20 Skid Row. The hotel is currently under-capacity, but as testing continues, the County expects beds
 21 may eventually be filled. If that does not occur, the County may decide to convert these beds for

22
 23 ⁴ As of April 13, 2020, the County has secured contracts for 899 isolation and quarantine beds
 24 Countywide. Currently, 162 beds are occupied, with approximately 70 beds in use by persons
 25 experiencing homelessness. The County notes that while the County may have isolation or
 26 quarantine beds under contract, those beds are made available upon need. As a result, the number
 27 of contracted beds Countywide is greater than the number of beds that are occupied. Separately,
 28 there are 515 beds available for high-risk persons experiencing homelessness Countywide, with 1,866
 rooms under contract. The County aims to make 1,300 new beds available Countywide within the
 next ten days or so. Approximately 417 beds are currently in use Countywide. An additional 917
 beds are under final negotiations and the County is actively negotiating with other hotel/motel
 vendors Countywide. The number of beds under contract, however, is greater than the number of
 available beds because after securing beds, it takes 1-5 business days to secure supportive services
 and staff to assist with hotel/motel administration.

1 use by high-risk persons experiencing homelessness. With respect to hotel/motel beds near Skid
 2 Row for high-risk individuals (i.e., within 5 miles of Skid Row), 169 beds have been secured.
 3 However, regionwide, the number of available beds or beds that are planned to become available
 4 within the next week is far greater. *See* fn. 4, *supra*.

5 **2. Housing Accommodations in or around Skid Row Not Related to COVID-19**

6 Over the last several years the County has tried to assist the City in increasing the
 7 availability of housing. The Court's order asks for "acquired properties, rental properties, and
 8 government facilities that can be readily converted" to house persons experiencing homelessness,
 9 with emphasis on Skid Row. The County is not aware of (nor does the County own) property in
 10 Skid Row that can be easily converted to housing. However, the County is taking steps to develop
 11 a large four-acre property near Union Station at 1060 N. Vignes Street with interim and/or
 12 affordable housing. On December 3, 2019, the Board of Supervisors unanimously voted to direct
 13 staff to review and make recommendations concerning how to best use the property. The County
 14 is exploring modular unit options and configurations for interim housing on the site. The Vignes
 15 property is approximately 1.5 miles from Skid Row. The proximity of the property to Skid Row
 16 could help alleviate the density of persons experiencing homelessness in Skid Row.

17 The County views the development of the Vignes property as directly related to the
 18 County's broader efforts to house persons experiencing homelessness, which involves developing
 19 housing but also connecting individuals with programs administered by the federal and state
 20 governments and programs funding by the County and provided by non-profits providing housing
 21 or rental subsidies. On February 28, 2020, the County Homeless Initiative also published its first
 22 quarterly report of 2020 tracking Countywide progress concerning the County's Board of
 23 Supervisors-approved strategies to build-out a comprehensive homeless services delivery system
 24 intended to assist persons experiencing homelessness throughout the County, including Skid Row.⁵
 25 *See* Attachment A.

26 ⁵ On February 6, 2016, the Board of Supervisors approved 51 strategies designed to build-out a
 27 comprehensive homeless services delivery system intended to assist persons experiencing
 28 homelessness throughout the County. Several strategies are specifically focused on increasing
 housing stock, using government property, partnering with private parties, or increasing the
 availability of rental subsidies. The Board-approved strategies have several goals including:

1 Finally, the County notes that Assistant County Chief Executive Officer and County Asset
2 Manager, David Howard, also will attend the Court's April 14, 2020 court hearing to discuss any
3 specific questions the Court may have relating to Skid Row. Mr. Howard will also be available to
4 assist in developing solutions specifically geared at supporting the Skid Row population, recognizing
5 that the County Board of Supervisors must approve any proposal and the Board is answerable to the
6 entire region.

7 Dated: April 13, 2020

8 MARY C. WICKHAM
9 COUNTY COUNSEL

10 Dated: April 13, 2020

11 MANATT, PHELPS & PHILLIPS, LLP

12 Dated: April 13, 2020

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14 Dated: April 13, 2020

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28

(1) prevent homelessness; (2) subsidize housing; (3) increase income; (4) provide case management and services; (5) create a coordinated system; and (6) increase affordability/homeless housing